

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	CHAPTER 11
	§	
KRISJENN RANCH, LLC, et al	§	CASE NO. 20-50805-rbk
	§	
DEBTOR	§	(Jointly Administered)

**DEBTORS' MOTION FOR EXPEDITED CONSIDERATION OF MOTION TO
APPROVE SALE OF REAL ESTATE ASSET FREE AND CLEAR OF ALL INTERESTS
PURSUANT TO 11 U.S.C. § 363(b)**

**MOVANT HAS REQUESTED EXPEDITED CONSIDERATION OF THIS MOTION AND
HAS REQUESTED THAT A HEARING BE HELD ON THIS MOTION AT THE
COURT'S EARLIEST CONVENIENCE. IF THE COURT IN FACT SETS THIS
MOTION FOR AN EXPEDITED HEARING, THEN ONLY ATTENDANCE AT THE
HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS. REPRESENTED
PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

KrisJenn Ranch, LLC, KrisJenn Ranch LLC, Series Uvalde Ranch, and KrisJenn Ranch, LLC, Series Pipeline Row (collectively, the "Debtors"), the Debtors and Debtors-in-Possession in the above captioned case, hereby file this Request for Expedited Consideration of Debtors' Motion to Approve Sale of Real Estate Asset Free and Clear of All Interests Pursuant to 11 U.S.C. § 363(b) and (f) (the "Motion") and in support thereof respectfully shows the Court as follows:

I. FACTUAL BACKGROUND

1. On April 27, 2020 (the "Petition Date"), Debtors filed a joint voluntary petition for relief under Chapter 11 of Title 11 of the United States Code. The cases were severed by the Court; however, the Debtors' respective cases continue to be jointly administered. The Debtors continue to manage their financial affairs as a debtors-in-possession pursuant to §§ 1107 and 1108 of the

Bankruptcy Code. No creditors' committee has yet been appointed in this case by the United States Trustee. No trustee or examiner has been requested or appointed.

2. Recently, Debtor, Krisjenn Ranch, LLC Series Uvalde Ranch obtained an offer for purchase of its 980.00 acre Ranch (the "Ranch"). The contract is a hard contract and the buyer desires to close immediately.

II. RELIEF REQUESTED

3. Debtors request expedited consideration of their

a. Motion to Approve Sale of Real Estate Asset Free and Clear of All Interests

Pursuant to 11 U.S.C. § 363(b) and (f) (the "Underlying Motion").

PRAYER

WHEREFORE, premises considered, Debtors respectfully request that the Court grant this request and set the Underlying Motion for an expedited hearing.

Dated: August 5, 2021

Respectfully submitted,

SMEBERG LAW FIRM, PLLC

By: /s/ Ronald J. Smeberg.

RONALD J. SMEBERG

State Bar No. 24033967

SMEBERG LAW FIRM, PLLC

4 Imperial Oaks

San Antonio, TX 78248

210-695-6684 (Tel)

210-598-7357 (Fax)

ron@smeberg.com

ATTORNEY FOR DEBTORS

CERTIFICATE OF CONFERENCE

I hereby certify that on the 5th day of August 2021, I conferenced with secured lender McLeod Oil via its counsel and it is unopposed to this motion.

CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2021, true and correct copies of the foregoing motion will be forwarded electronically via the Court's ECF System, or by U.S. first class mail, postage prepaid, on, all parties listed on the attached Service List.

/s/ Ronald J. Smeberg
RONALD J. SMEBERG

SERVICE LIST

DEBTOR

KrissJenn Ranch, LLC
410 Spyglass Rd
Mc Queeney, TX 78123-3418

300 E. 8th St. STOP 5026
AUS
Austin, TX 78701

Shelby County, Tax
Collector
200 St. Augustine St.
Center, Texas 75935

**GOVERNMENT
ENTITIES**

Office of the UST
615 E Houston, Room 533
PO Box 1539
San Antonio, TX 78295-1539

Texas Comptroller of
Public Account
Attn: Bankruptcy
P.O. Box 149359
Austin, TX 78714-9359

Tenaha ISD Tax Assessor-
Collector
138 College St
Tenaha, TX 75974-5612

Angelina County Tax
Assessor
606 E Lufkin Ave,
Lufkin, Texas 75901

Uvalde Tax Assessor
Courthouse Plaza, Box 8
Uvalde, Texas 78801

U.S. Attorney
Attn: Bkcy Division
601 NW Loop 410, Suite
600
San Antonio, Texas 78216

Nacogdoches County Tax
Assessor Collector
101 West Main Street
Nacogdoches, Texas
75961

NOTICE PARTIES

METTAUER LAW FIRM
c/o April Prince
403 Nacogdoches St Ste 1
Center, TX 75935-3810

Internal Revenue Services
Special Procedures Branch

Rusk County
202 N Main St,
Henderson, Texas 75652

Albert, Neely & Kuhlmann
1600 Oil & Gas Building

309 W 7th St
Fort Worth, TX 76102-6900

Laura L. Worsham
JONES, ALLEN &
FUQUAY, LLP
8828 Greenville Ave.
Dallas, Texas 75243

Craig Crockett
CRAIG M. CROCKETT, PC
5201 Camp Bowie Blvd.
#200
Fort Worth, Texas 76107

Christopher S. Johns
JOHNS & COUNSEL
PLLC
14101 Highway 290 West,
ste 400A
Austin, Texas 78737

Timothy Cleveland
CLEVELAND|TERRAZA
S PLLC
4611 Bee Cave Road, ste
306B
Austin, Texas 78746

Andrew R. Seger
KEY TERRELL &
SEGER
4825 50th Street, ste A
Lubbock, Texas 79414

**SECURED
CREIDITORS**

McLeod Oil, LLC
c/o John W. McLeod, Jr.
700 N Wildwood Dr
Irving, TX 75061-8832

**UNSECURED
CREIDITORS**

Bigfoot Energy Services
312 W Sabine St
Carthage, TX 75633-2519

C&W Fuels, Inc.
Po Box 40
Hondo, TX 78861-0040

Davis, Cedillo & Mendoza
755 E Mulberry Ave Ste
500
San Antonio, TX 78212-3135

Granstaff Gaedke &
Edgmon
5535 Fredericksburg Rd
Ste 110
San Antonio, TX 78229-3553

Hopper's Soft Water
Service
120 W Frio St
Uvalde, TX 78801-3602

Larry Wright
410 Spyglass Rd
Mc Queeney, TX 78123-3418

Medina Electric
2308 18th St.
Po Box 370
Hondo, TX 78861-0370

Medina's Pest Control
1490 S Homestead Rd
Uvalde, TX 78801-7625

Texas Farm Store
236 E Nopal St
Uvalde, TX 78801-5317

Uvalco Supply

2521 E Main St
Uvalde, TX 78801-4940

Longbranch Energy
c/o DUKE BANISTER
RICHMOND
Po Box 175
Fulshear, TX 77441-0175

DMA Properties, Inc.
896 Walnut Street at US
123 BYP
Seneca, SC 29678